

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**WISEBITS IP, LTD.'S MOTION FOR
PROTECTIVE ORDER**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA,
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193

**WISEBITS IP, LTD.'S MOTION FOR
PROTECTIVE ORDER**

Defendant Wisebits IP, LTD hereby moves for a protective order as required by Local Rule 30.04; Federal Rules of the Civil Procedure 26(c) and 30(d)(3). The grounds for this motion, as

more fully set forth in the attached memorandum of law and whatever oral argument the court requires, are that Plaintiffs' counsel's examination was improper under Local Civil Rules and Federal Rules of the Civil Procedure.

Respectfully Submitted,

/s/ Hannah Rogers Metcalfe

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Greenville, South Carolina